

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DR. ALAN SACERDOTE, et al.,

: Case No.: 1:16-cv-06284

Plaintiffs,

: ECF Case

vs.

NEW YORK UNIVERSITY,

: **DECLARATION OF IAN C. TAYLOR IN
SUPPORT OF MOTION TO EXCLUDE
PLAINTIFFS' EXPERT MICHAEL
GEIST**

Defendant.

Ian C. Taylor hereby declares as follows:

I am an attorney at law admitted *pro hac vice* to practice before this Court and I am a partner with the law firm DLA Piper LLP (US), attorneys for Defendant New York University (“NYU”) in this matter. I submit this Declaration to transmit to the Court true and correct copies of the documents referenced in the Memorandum of Law in Support of NYU’s Motion to Exclude Plaintiffs’ Expert Michael Geist. I make this Declaration upon my personal knowledge and in support of NYU’s Motion to Exclude Plaintiffs’ Expert Michael Geist.

1. Attached hereto as Exhibit 1 is a true and correct copy of the February 6, 2018 Second Corrected Expert Report of Michael Geist.

2. Attached hereto as Exhibit 2 are true and correct copies of excerpts of the certified transcript from the February 7, 2018 deposition of Michael Geist.

3. Attached hereto as Exhibit 3 is a true and correct copy of the December 22, 2017 Expert Report of Michael Geist.

4. Attached hereto as Exhibit 4 are true and correct copies of excerpts of the certified transcript from the March 20, 2018 deposition of Michael Geist.

5. Attached hereto as Exhibit 5 is a true and correct copy of Michael Geist's Snapshot Effective Price Spreadsheet.

6. Attached hereto as Exhibit 6 is a true and correct copy of the January 22, 2018 Rebuttal Report of Marcia Wagner.

7. Attached hereto as Exhibit 7 is a true and correct copy of the January 22, 2018 Rebuttal Report of Michael Geist.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of March 2018.

Dated: March 26, 2018
Washington, D.C.

/s/ Ian C. Taylor
Ian C. Taylor